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**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington  
corporation,  
  
Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 7

**NOTICE OF CHAPTER 7  
TRUSTEE'S MOTION FOR RELIEF  
FROM STAY AND OPPORTUNITY  
FOR HEARING**

**PLEASE TAKE NOTICE** that Mark D. Waldron, the Chapter 7 Trustee, has filed his Motion for Relief from Stay, ECF No. 1033, asking the Court to lift the automatic stay and modify the [Memorandum Opinion and Order Regarding Stay and Motion for Order to Show Cause](#) ("Automatic Stay Order"), dated September 27, 2021, ECF No. 921, to permit Jun Dam, Eric Blomquist, Perkins Coie LLP, Perkins Coie California, P.C., Perkins Coie U.S., P.C. and Lowell Ness to amend the complaint and seek approval of the settlement ("WTT Token Settlement") of Mr. Dam's putative class action complaint filed in the United States District Court for the Eastern District of Washington ("District Court"), Case No. 2:20-cv-00464-SAB. Subject to District Court approval, Perkins has

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1 agreed to pay \$4.5 million to a class of WTT token holders. Pursuant to the WTT  
2 Token Settlement, WTT token holders are releasing the Giga Watt the estate of all  
3 claims that arise from or relate to the facts giving rise to the Class Action. The  
4 Trustee's settlement with Perkins Coie LLP and Lowell Ness, approved by the  
5 Court on October 5, 2023, ECF No. 1031, pursuant to which the Giga Watt estate  
6 will receive \$3.0 million from Perkins Coie LLP and Lowell Ness, is contingent  
7 on approval by the District Court of the WTT Token Settlement. Alternatively, the  
8 Trustee has asked for an indicative ruling pursuant to Bankruptcy Rule 8008 that  
9 it would grant the foregoing relief but for the appeal of the Automatic Stay Order  
10 (D. Ct., Case No. 21-291). If the settlements do not successfully conclude, the stay  
11 will be in place as if it had not been lifted. The Trustee has also asked for an order  
12 waiving the 14-day stay provided by Bankruptcy Rule 4001(a)(3) such that the  
13 Order will be enforceable immediately upon entry.

14 If you wish to object to the foregoing relief, then you must file with the  
15 above-captioned court and serve upon undersigned counsel an Objection by  
16 November 9, 2023. The Court may enter an order without an actual hearing or  
17 further notice unless a written objection is timely served and filed. If an objection  
18 is timely filed and served, the Trustee will obtain a hearing date and time from the  
19 court's website and will notify the objecting party of the date of the hearing.

20 Dated: October 19, 2023

POTOMAC LAW GROUP PLLC

21 By: /s/ Pamela M. Egan  
22 Pamela M. Egan (WSB No. 54736)

23 *Attorneys for Mark D. Waldron, Chapter 7  
Trustee*

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